

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
RAZIE ALTHOLZ,

Plaintiff,

-against-

THE UNITED SYNAGOGUE OF CONSERVATIVE  
JUDAISM,

Defendant.

-----X

Docket No.:

**NOTICE OF REMOVAL**

Defendant THE UNITED SYNAGOGUE OF CONSERVATIVE JUDAISM (the “USCJ”), by and through their attorneys, SOKOLOFF STERN LLP, as and for their Notice of Removal set forth as follows:

1. Plaintiff commenced this action in the Supreme Court of the State of New York, County of Kings on July 9, 2021. (A copy of the Summons and Verified Complaint is attached as Exhibit A.)

2. No further proceedings have been held in this action.

3. Plaintiff seeks relief under United States federal law. Specifically, Plaintiff’s third cause of action seeks relief under Title VII of the Civil Rights Act of 1964, 42 USC 2000e, et seq., and her fourth cause of action seeks relief under the Family and Medical Leave Act (“FMLA”). (Ex. A, ¶¶ 58-68; 68-75.)

4. This case, therefore, falls within this Court’s federal question jurisdiction pursuant to 28 U.S.C. § 1331, which provides, “The district courts shall have original jurisdiction of all civil actions arising under the Constitution, laws, or treaties of the United States.”

5. The USCJ Defendant is entitled to remove this action, pursuant to 28 U.S.C. § 1441(a), which provides:

Except as otherwise expressly provided by Act of Congress, any civil action brought in a State court of which the district courts of the United States have original jurisdiction, may be removed by the defendant or the defendants, to the district court of the United States for the district and division embracing the place where such action is pending.

6. A notice of removal shall be filed within 30 days after receipt by a defendant of a copy of the initial pleadings. *See* 28 U.S.C. § 1446(b)(1), (2). Defendant UCSJ received notice of this lawsuit on July 9, 2021. Thus, removal is timely and proper.


7. Plaintiff resides in Kings County, and Plaintiff filed this action in New York State Supreme Court, Kings County. The alleged conduct giving rise to Plaintiff's claims occurred in New York County. Therefore, removal to the courthouse of the Eastern District of New York is appropriate.

8. No other defendants are named in this action.

WHEREFORE, Defendant UNITED SYNAGOGUE OF CONSERVATIVE JUDAISM respectfully requests that the above-captioned proceeding, now pending in the Supreme Court of the State of New York, County of Kings, be removed therefrom to this Court.

Dated: Brooklyn, New York  
August 3, 2021

SOKOLOFF STERN LLP  
*Attorneys for Defendant*

By:   
Leo Dorfman  
179 Westbury Avenue  
Carle Place, NY 11514  
(516) 334-4500  
File No. 200175

TO: ALAN J. BENNETT, PLLC  
369 Lexington Avenue, Suite 213  
New York, NY 10017  
(212) 696-2116